

EXHIBIT 15

ALEX G. TSE (CABN 152348)
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JUL 27 2018

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE GRAND JURY INVESTIGATION
NO. 2012R02242,

Case No. CR 14-90491 MISC EMC

UNDER SEAL

~~PROPOSED~~ THIRD ORDER
SUSPENDING THE RUNNING OF
THE STATUTE OF LIMITATIONS
UNDER 18 U.S.C. § 3292

On January 29, 2016, upon an application of the United States dated January 29, 2016, indicating that evidence of offenses, namely 15 U.S.C. §§ 78j(b) & 78ff (securities fraud), 18 U.S.C. § 371 (conspiracy), 18 U.S.C. § 1341 (mail fraud), 18 U.S.C. § 1343 (wire fraud), 18 U.S.C. § 1348 (securities fraud), and 18 U.S.C. § 1349 (attempt and conspiracy), was in the Vatican City State and in Italy, the Court issued an Order Suspending the Running of the Statute of Limitations Under 18 U.S.C. § 3292 (the "January 29, 2016 Order"). The Court found, by a preponderance of the evidence, that an official request had been made to the Vatican City State for evidence of the foregoing offenses and it reasonably

~~PROPOSED~~ THIRD ORDER SUSPENDING THE RUNNING OF THE STATUTE OF LIMITATIONS UNDER 18 U.S.C. § 3292,
CASE NO. CR-14-90491 MISC EMC

1 appeared that such evidence was in the Vatican City State. The Court also found, by a preponderance of
2 the evidence, that an official request had been made to Italy for evidence of the foregoing offenses and it
3 reasonably appeared that such evidence was in Italy. The Court ordered that the running of the statute of
4 limitations for the foregoing offenses be suspended beginning on August 10, 2015, the date on which the
5 official request to the Vatican City State was made, and ending on the date on which the Vatican City
6 State takes final action on the request. The Court further ordered that the running of the statute of
7 limitations for the foregoing offenses be suspended beginning on December 23, 2015, the date on which
8 the official request to Italy was made, and ending on the date on which Italy takes final action on the
9 request.

10 On June 7, 2016, upon an application of the United States dated June 7, 2016, the Court issued a
11 Second Order Suspending the Running of the Statute of Limitations Under 18 U.S.C. § 3292. The Court
12 found that an official request for evidence of offenses had been made to the United Kingdom and that it
13 reasonably appeared that such evidence was in the United Kingdom. The Court ordered that the running
14 of the statute of limitations be suspended beginning on January 29, 2016, the date on which the official
15 request to the United Kingdom was made, and ending on the date on which the United Kingdom takes
16 final action on the request.

17 On July 27, 2018, the United States submitted a third *Ex Parte* Application for an Order
18 Suspending the Running of the Statute of Limitations Pursuant to 18 U.S.C. § 3292 (the "July 27, 2018
19 Application"), indicating that further evidence of the foregoing offenses is in the United Kingdom and
20 that a supplemental official request was made to the United Kingdom on May 1, 2017. The Court,
21 having considered the July 27, 2018 Application and the supporting declaration, hereby ORDERS as
22 follows:

23 (1) The July 27, 2018 Application is GRANTED.

24 (2) The Court finds, by a preponderance of the evidence, that an official request dated May 1,
25 2017, has been made to the United Kingdom for evidence of the foregoing offenses and it reasonably
26 appears that such evidence is in the United Kingdom.

(3) The running of the statute of limitations for the foregoing offenses is SUSPENDED beginning on May 1, 2017, the date on which the supplemental official request to the United Kingdom was made; and ending on the date on which the United Kingdom takes final action on the supplemental official request.

(4) With respect to evidence requested from the United Kingdom in the January 29, 2016 official request, the Court's June 7, 2016 Order is continued and the running of the statute of limitations for the foregoing offenses is suspended beginning on January 29, 2016, the date on which the initial official request to the United Kingdom was made, and ending on the date on which the United Kingdom takes final action on the initial official request.


(5) With respect to evidence requested from the Vatican City State, the Court's January 29, 2016 Order is continued and the running of the statute of limitations for the foregoing offenses is suspended beginning on August 10, 2015, the date on which the official request to the Vatican City State was made, and ending on the date on which the Vatican City State takes final action on the request.

(6) With respect to evidence requested from Italy, the Court's January 29, 2016 Order is continued and the running of the statute of limitations for the foregoing offenses is suspended beginning on December 23, 2015, the date on which the official request to Italy was made, and ending on the date on which Italy takes final action on the request.

It is further ordered that the Clerk of the Court shall seal this Order, as well as the United States' *Ex Parte* Application for an Order Suspending the Running of the Statute of Limitations and the Declaration of AUSA Robert S. Leach in support thereof, pending further order of the Court.

IT IS SO ORDERED.

Dated: August 8, 2018



THE HONORABLE EDWARD M. CHEN.
United States District Judge

United States District Court
Northern District of California

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

USA,

Plaintiff,

v.

In re: Under Seal,

Defendant.

Case No.14-90491 MISC EMC

CERTIFICATE OF SERVICE


I, the undersigned, hereby certify that I am an employee in the Office of the Clerk, U.S. District Court, Northern District of California.

That on 8/8/2018, I SERVED a true and correct copy(ies) of the attached, by placing said copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by depositing said envelope in the U.S. Mail, or by placing said copy(ies) into an inter-office delivery receptacle located in the Clerk's office.

Adam Reeves
Department of Justice U.S. Attorney Office, NDCA
450 Golden Gate Avenue
San Francisco, CA 94102

Dated: 8/8/2018

Susan Y. Soong
Clerk, United States District Court

By: 
Lashanda Scott, Deputy Clerk to the
Honorable CHARLES R. BREYER